

# **NSA Mid-South BCT Minutes**

MAY 21, 2007 10:00 A.M.-3:30 P.M. PUBLIC WORK'S CONFERENCE ROOM BUILDING 455

MEETING CALLED BY	Ben Brantley				
TYPE OF MEETING	NSA Mid-South Base (	Cleanup Team (BCT)	) Meeting		
FACILITATOR	Ben Brantley		. 1111.11 1111.111111111111111111111111		
NOTE TAKER	Carol Triggs				
TIMEKEEPER	Dana Grady				
ATTENDEES				onovan, Gregory Fraley, Paul Gentry, obb Unger, Randy Wilson	
Name	Organization	Phone	Fax	e-mail	
Ben Brantley	EnSafe	(901) 372-7962	(901) 372-2454	bbrantley@ensafe.com	
Robb Unger	Spectra Tech, Inc.	(865) 483-7210	(865) 483-7262	robbunger@spectratechinc.com	
Roger Donovan	TDEC (Nashville)	(615) 532-0864	(615) 532-0886	roger.donovan@state.tn.us	
Charles Burroughs	TDEC (Nashville)	(615)-532-0863	(615) 532-0886	charles.burroughs@state.tn.us	
Jack Carmichael	USGS (Nashville)	(615) 837-4704	(615) 837-4799	jkcarmic@usgs.gov	
Gregory D. Fraley	EPA Region 4	(404)-562-8544	(404) 562-8518	fraley.gregory@epamail.epa.gov	
Jim Heide	NSA Mid-South	(901) 874-5367	(901) 874-7022	<u>jim.heide@navy.mil</u>	
Rob Williamson	NSA Mid-South	(901) 874-5399	(901) 874-7022	rob.williamson@navy.mil	
Howard Hickey	NAVFAC Midwest	(847) 688-5999	(847) 688-2319	howard.hickey@navy.mil	
Dudley Patrick	NAVFAC Southeast	(843) 743-2136		dudley.patrick@navy.mil	
Danny Chumney	NSA Mid-South	(901) 874-5904	901) 874-7022	danny.chumney@navy.mil	
Randy Wilson	NSA Mid-South	(901) 874-5902	(901) 874-7022	randy.wilson @navy.mil	
Dana Grady	EnSafe Inc.	(901) 372-7962	(901) 372-2454	dgrady@ensafe.com	
Carol Triggs	EnSafe Inc.	(901)372-7962	(901) 372-2454	ctriggs@ensafe.com	

## Agenda topic

Topic		Check in/Introductions	Team Memb.
DISCUSSION	Attendees introduced themse be distributed.	lves and the organizations represented.	Discussed need for contact list to
ACTION ITEMS		PERSON RESPONSIBLE	RESOLUTION
Email contact I	ist to Gregory Fraley	Ben Brantley	Completed – 5/22/07 (email)
Topic	Active Project S	Summary	Dana Grady/Ben Brantley
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**DISCUSSION** Reviewed status of active Installation Restoration (IR) and BRAC sites and ongoing interim measures.

Dana G. gave an overview of the Interim Measures ongoing for SWMUs 14, 39 and AOC A, the site histories and sampling/reporting frequencies. Dana G. indicated AOC A report was going to recommended injections be discontinued within sub-plume C since VOCs had been reduced to at or near non detect levels for multiple sampling events. Also, wells at SWMUs 14 and 39 that had histories of non-detect were recommended for discontinuation of monitoring including wells 014G1LS, 014G3LS, 014G5LS, and 014G10LS, 039G05LF, 39G11LF, 039G14LF, and 39G15LF. Other SWMU 14 and 39 recommendations (to be included in the upcoming IM Progress reports) were that the sampling frequency be reduced from quarterly to semi-annually at SWMU 14 and reporting frequency be reduced from semi-annual to annual at both SWMUs. Injections were to continue on a monthly basis. The BCT concurred and indicated this should be memorialized in a letter to TDEC and USEPA.

Dudley Patrick inquired about buildings over the AOC A treatment area and keeping an eye on methane levels that could

be accumulating inside buildings. Ben B. indicated plume and treatment areas were outside bldg. footprints and therefore methane accumulation should not be concern to nearby buildings.

Howard Hickey inquired about the success of the Parson's Engineering Veggie Oil pilot study. Dana G. and Ben B. indicated that due to the lengthy time associated with notable VOC degradation, the BCT had elected to bring the site under the AOC A injection/treatment plan.

In the addition the IM SWMUs, groundwater monitoring was being conducted at SWMU 2 (Southside Landfill) and a comprehensive Northside event was being conducted annually, concurrent with one of the two semi-annual AOC A monitoring events. This data is provided in the AOC A monitoring reports.

ACTION ITEMS	PERSON RESPONSIBLE	RESOLUTION
01-Send Howard Hickey a copy of Parsons' Vegetable Oil Report	Ben Brantley	Completed 8/16/07 (email)
02- Check Gateway (EnSafe) for Howard H. access	Ben Brantley	Complete 8/16/07 (email)
03- Draft Letter to Send to TDEC and USEPA regarding recommended modifications to SWMU 14 and 39 sampling and reporting frequency.	Ben Brantley	Completed 7/11/07 (hardmail)
04-Scan GW Well Management Plan for Dudley (Randy has copy)	Ben Brantley	Completed 6/12/07 (Posted to EnSafe server)

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#### **Review Project and Deliverables Schedule**

Ben Brantley

DISCUSSION

Updated schedules for SWMUs 2, 14, 39 and AOC-A were distributed to the Team.

EnSafe went over project schedules, past and pending deliverables, and comment status from TDEC and USEPA for SWMUs 2, 14, 39 and AOC A. Acknowledgement/approval letters had been received for all progress reports from TDEC however, still pending from USEPA.

EnSafe indicated SWMU 2 sampling frequency was to be increased in 2007 from annually to semi-annually to reflect TDEC and USEPA comments on last SWMU 2 progress report. Roger Donovan indicated that he would forward a copy of a document where an alternate concentration limit (ACL) was developed for a site. During the last BCT, TDEC suggested that we consider this for SWMU 2 instead of relying on MNA as the final remedy, particularly since the MNA/VOC data was not overly compelling. The groundwater protection standard that becomes established for the site through an ACL is based on a surface water body receptor and takes into account stream flow, dilution, and enables one to calculate a maximum allowable concentration limit at a point of compliance. Charlie B. indicated monitoring would continue in to perpetuity; however it would alleviate the MNA monitoring requirement that is currently required.

AOC A and SWMU 15 are the only Northside BRAC SWMUs that have outstanding Statement of Basis (SOB). Charlie B. indicated that we can proceed with preparing SOBs for these and the other SWMUs that are undergoing IMs now or later. SWMU 15 underwent a soil removal to address petroleum contaminated soil by STEP. Randy W. has copy of Excavation Summary Report that he'll forward to Ben B. for scanning and delivery to Dudley P. Roger D. indicated he could obtain copy from STEP if unsuccessful locating document.

ACTION ITEMS	PERSON RESPONSIBLE	RESOLUTION
05-Send ACL example/memo to EnSafe for SWMU 2 go by	Roger Donovan/Charlie B.	Completed 5/22/07 (email)
06- Send TDEC/USEPA letter indicating increased groundwater monitoring frequency at SWMU 2.	Ben Brantley	Completed 7/11/07 (hardmail)
07- Provide hard copy of STEP Excavation Summary Report to Ben B.	Rob Williamson	Status ?

### **Topic**

### Review Action Items from November 2006 BCT Meeting

Project team

**DISCUSSION** Action Items from Previous BCT Meeting

EnSafe reviewed Nov. 2006 meeting minutes and indicated RAB Charter had undergone two revisions and no MOA existed for BCT or RAB. Last RAB meeting discussions were held about disbanding the RAB due to the lack of community involvement and twilight of environmental investigations at base; however, community (RAB members) wanted to retain. Dudley P. indicated that Navy should try to disband the RAB through a mailing to RAB members and possible public notice but should first debrief/meet with the Mayor of Millington. Suggested it be handled by Facility personnel since they have local presence and familiarity with Millington Mayor.

Administrative Record - Question was raised where maintained and whether current. Randy W. indicated it is maintained at the repository on base (publicly available); however, EnSafe and Randy W. were unsure whether current. The post-CLEAN follow-on work by Spectra Tech/EnSafe is not being added to the Administrative Record; however, Robb U. will verify whether there's a line item in existing contract that addresses AR maintenance requirement.

ACTION ITEMS	PERSON RESPONSIBLE	RESOLUTION
08-Draft a letter for dissolving the RAB and provide to Activity before issuance to RAB members.	Dudley Patrick	Status ?
09-Contact Mayor of Millington with a "heads up" notification of Navy's intent on disbanding RAB before issuing Dudley's letter	Rob Williamson	Status ?
10-Get mailing list from Public Affairs Office of RAB Members	Ben Brantley	Completed (R. Williamson)
11-Check to see if the AR repository is current through 2005 or where left off.	Rob Williamson	Status ?
12-Determine whether AR maintenance is specified in existing contract with SpectraTech/EnSafe	Robb Unger	Status ?

Check status of any outstanding action items from earlier BCT meetings and whether Dudley P. needs to resolve

Ben Brantley

Completed-8/21/07 (email)

Topic Proposed LTM Modification Dana Grady/Ben Brantley

**DISCUSSION** Rationale for modifying LTM program (number of wells, reporting frequency for SWMUs 14 and 39)

Dana G. handed out analytical summary tables and site maps for SWMUs 14 and 39 to illustrate why a subset of wells were being proposed for discontinued monitoring. SWMU 2 wells 002G26DA and 002G27DA were also recommended for discontinued monitoring. Wells were shown to be spatially outside of the VOC plumes and had 8 sampling events where VOCs were not detected (list of wells presented above in the Active Project Summary Topic). Sampling was proposed to go to semi-annual for SWMU 14 and remain quarterly for SWMU 39. Reporting was also recommended to go to annual instead of semi-annual for both SWMUs. The BCT concurred with the recommendations and Roger D. suggested that the Navy send a letter/memo to TDEC/USEPA with the recommendations so that there's an official record of the decision. Ben B. indicated the recommendations would also be captured in the June 2007 progress reports for SWMUs 14 and 39.

AOC A sampling frequency should remain as is (semi-annually for IM wells, annually for non-IM wells). Although a subset of AOC A wells should probably be similarly removed from the AOC A monitoring, particularly those included in the comprehensive annual sampling; however, there are 90+ wells that have to be evaluated and a tech memo would have to generated that explains rationale, historical concentrations, and well locations wrt to plumes. This work is outside the currently funded scope between Navy and Spectra Tech/EnSafe; therefore Navy would need to fund this as separate task.

ACTION ITEMS	PERSON RESPONSIBLE	DEADLINE
13-Send letter on Navy's behalf (after review by Dudley and Howard) for reducing SWMUs 2, 14/39 monitoring wells, reporting frequency, and sampling frequency (SWMU 14 only). Tables and plume maps should accompany letter.	Dana Grady	Completed 7/11/07 (hardmail)
14-Send Navy cost proposal for preparing Tech Memo outlining modification of LTM at AOC A.	Robb U.	Status ?
15-Check on funding for generating Tech Memo and eventual base-wide well abandonment	Dudley P.	Status ?

Base-wide plug and abandonment of inactive monitoring wells. DISCUSSION

Upon concurrence on the AOC A wells recommended for abandonment has been reached, a base-wide plug and abandonment will need to be conducted. There are currently 220+ wells on base, of which only 90+ are being monitored which will be reduced further after vetting the AOC A wells and reducing the SWMU 39 and 14 wells. Decommissioning wells will facilitate the annual well inspection that is required by the Shelby County Health Department. After the basewide abandonment is complete, the Groundwater Well Management Plan will need to be updated.

ACTION ITEMS		PERSON RESPONSIBLE	RESOLUTION
Generate Tech Mer	no for AOC A Well Abandonment	Dana G.	Pending Navy Funding
Generate Work Plants is approved by TDE	n with list of wells for P&A after AOC A Tech Memo C and USEPA.	Spectra/EnSafe	Pending Navy Funding
Prepare a list of we existing contract.	ells that are not currently in the scope of the	Robb U.	Status ?
Topic	Statement of Basis (SOB)		Roger D. and Charlie B.

#### DISCUSSION Status of TDEC review for 22 SWMUs.

The status of the State's review process is the same as in November, 2006. TDEC indicated there is a lot of risk information on sites that was unnecessarily included in the SOBs and State prefers it out of document. TDEC stated it should be written in layman's terms and easy to read. If no contamination, then risk information should not be presented. EPA indicated that the SOBs need to satisfy TDEC's needs (versus trying to strike balance between both agencies, as they are currently written). Roger D. stated that he would rewrite the SOBs to the format that State likes and that he will be contacting EnSafe and the Navy for any data needs or questions. The TDEC is rewriting the SBs.

ACTION ITEMS		PERSON RESPONSIBLE	RESOLUTION
Provide examples of SOBs to follow for future reference  Provide Howard H. list of status for State of Basis divided into those that are done, the ones that are not (AOC A, SWMU 14, SWMU 39, and SWMU 15).		Charlie Burroughs	Status ?
		Ben Brantley	Completed – 8/21/07
Rewrite SOBs		Roger Donovan	Status ?
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#### **DISCUSSION** Miscellaneous

Randy Wilson indicated there is an implementation of a public/private housing venture on the base. The Navy will no longer own the housing, just the land the housing sits on. Contractors should be aware that scheduling for work to be performed must be done well in advance because of the new arrangement and coordinate through appropriate personnel (contact Randy W. for appropriate contact)

Question rose whether heating oil tanks were used for base housing. Some senior officers' quarters may still have USTs for heating oil.

There is an attempt to get MRP funding in 2009 for the former range sites. Sites are on both the ERN and BRAC sides of the base.

BCT decided that next meeting should meet ½ day on first day and allow for the entire next day. A 1.5 hr site tour was recommended for the following meeting. Next BCT meeting scheduled for Wednesday-Thursday September 5 and 6, 2007. Start at 1:00 on Wednesday.

Meeting Adjourned at 1530 on 5/21/2007

Action Item	Person Responsible	Resolution
Send out Agenda for August BCT Meeting via email	Ben Brantley	Pending